

November 2001

# **INTERIM GUIDANCE FOR FOOD AND AGRICULTURE SAFETY AND SECURITY IN CALIFORNIA**



# INTERIM GUIDANCE FOR FOOD AND AGRICULTURE SAFETY AND SECURITY

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## BACKGROUND

The potential for contamination of our food supply has always been present. The food industry has responded with sound food production, processing and distribution practices to minimize this threat. Now a rise in terrorism has increased the potential for food contamination<sup>1</sup>. Sound security practices are needed to minimize this threat to public safety and the food industry. The security practices listed below are recommended for all food operations; the attached checklist offers more specific suggestions that may not always be appropriate or even feasible for your food operations. The goal of these security practices is to reduce the likelihood of a terrorist attack on your operations and to reduce a successful attack's impact to you, your business partners and the public. While the terrorist risk to an individual business is low, sound security practices represent good public health and smart business sense.

We recommend that you consider any trusted employees as your advisors in designing and implementing new security practices. The "ownership" of your practices by employees will be your most valuable line of defense.

## IDENTIFY SECURITY WEAK SPOTS

### Identify the Weak Spots

The initial step is to identify the security weak spots for each activity or step in the process of food preparation. To understand the flow of events in food production, it is helpful to first list the sequence for food preparation.

### Identify the Resulting Hazards

Once the security weak spots have been identified consider the risk of each resulting hazard. Risk is the probability and severity of loss or negative impact to the food product from exposure to the hazard.

Put yourself in the role of a dedicated terrorist considering an attack on your operations and then review your entire operation from beginning to end. Ask yourself "What if..." type questions and think "outside the box".

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<sup>1</sup> The Center for Counterproliferation Research reported that over 1/3 of the 16 confirmed cases of bioterrorism and 31 confirmed biocrimes committed in the U.S. (prior to 1999) involved food or other agricultural products.

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Identify points at which unauthorized persons have easy access to your facilities (e.g. via unlocked gates, doors or trucks) and those of your vendors and shippers.

Identify points at which the employees of your vendors, shippers and other businesses you regularly interact with have unnecessary access to a critical part of your operations.

Identify points at which your employees have unnecessary access to a critical part of your operations.

Identify methods by which any person could introduce, store or move unauthorized materials within your operations.

Identify any record “gaps” in the documentation of your product’s production, processing and distribution history.

Identify situations in which a terrorist act at or by a supplier, vendor or shipper could impact your operations (e.g., delivery of contaminated ingredient, contamination of your product during shipping).

Assess the food security awareness and commitment of your employees.

### **DEVELOP AND IMPLEMENT PRACTICES TO FEASIBLY STRENGTHEN AS MANY WEAK SPOTS AS POSSIBLE**

#### **Analyze Risk Control Measures**

Examine risk control measures for the possible hazards that could be introduced into the operation. Identify and explore specific options and tools that reduce, or eliminate risk. Prioritize the risks and starting with the highest risk identify as many risk control options as possible. To identify an effective control measure it will reduce or eliminate one of the three risk components (probability, severity, or exposure). Other things to consider include the risk control costs and how various risk control options work together.

#### **Make Control Decisions**

There are several important points to keep in mind when making a risk control decision. Involve the employees who would be impacted by the risk control decision to the maximum extent in the selection. They can almost always provide ideas to enhance the various options. In addition, be sure to carefully evaluate the impact on the operation of the risk control action. The objective is to choose the option that has the best overall favor

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able impact on the operation. Once the best possible set of risk control options has been selected, the individual in charge must accept this decision.

### **Implement Risk Controls**

Part of the process of implementing control measures is to inform personnel in the system of the risk management process results and subsequent decisions. Careful documentation of each step in the risk management process facilitates risk communications.

Some degree of security risk is unavoidable. Your goal is to continuously minimize this risk wherever it is feasible to do so. For example, if it is infeasible to lock a door, it might still be feasible to reduce its attractiveness as an entry point (e.g., better lighting) or to know if unauthorized entry has occurred (e.g., alarm, door seals).

Thoroughly inspect incoming raw materials and other supplies and document the inspections.

Keep accurate inventories of incoming raw materials and outgoing finished products. Retain samples for reference purposes.

If products can be returned to you, have a written policy describing how the products are to be handled including the steps that are to be taken to keep returned product separate from regular stock

Do all you can to assure the clear identification of the raw materials (including water) used to produce your product and of the finished product itself as it moves through distribution channels (ideally the raw materials and finished product would be identified by batch or lot codes). This will help avoid having your safe products being swept off the market with unsafe products and will help agencies trying to determine where, and the means by which, the attack took place.

Use and regularly change passwords (at least eight characters and preferably incorporating some non-alphabetical characters) for computer systems. Make sure anti-virus software is current.

Make sure that employees identified as responsible for security know the roles and responsibilities of the various food safety agencies in California. See Attachment I - Agency List.

Prepare a written recall plan. See Attachment II - FDA Recall Policies.

Prepare a written evacuation and employee safety plan.

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Prepare a written plan for continued operation (e.g., at another facility) if your facility becomes temporarily unusable. Identify alternate sources of raw materials and other supplies (including water).

Make and keep current a list of people and agencies (e.g., local fire and police departments, Food and Drug Branch), including alternates, you may need to quickly contact if an attack occurs involving your facility and the various ways you can contact them (e.g., home and work phones, FAX, E-mail).

Make sure that agencies that may have to respond in an after hours situation (e.g., local Hazardous Materials units) know how to contact you and your employees who are responsible for security. Review facility layout with Hazardous Materials units.

Identify yourself (or select and identify another single employee) to all your employees as being responsible overall for food security issues. Select and identify additional employees to be responsible for parts of your security plan as available and necessary. Be sure to include the selected employees in your security decision-making process and gain their support. These employees should be able at all times during their shifts to know who is, and who should be, at your facility and where. Do not make employees responsible for something they are not able and authorized to control.

### Supervise and Review

Supervision and review process should be systematic and ensure control recommendations have been implemented. In addition, the need for further evaluation of a process due to unanticipated change could result in additional actions. A feedback system is needed to ensure that the corrective or preventive action taken was effective and that any additional corrective action can be implemented as required.

Immediately investigate all reports of suspicious or unusual activity (including missing or excess stock) that might be related to the security of your products or facility. Thoroughly document each investigation in writing. Report any findings of concern to appropriate agencies.

Randomly inspect your facility for compliance with security practices. Hold all employees accountable for understanding and complying with the security practices. Reward employees who report security breaches and weak spots.

Sound security practices will be needed indefinitely. But this does not mean that practices should remain unchanged. Periodically review your practices with the goal of improving security while maintaining or reducing their cost and impact to your facility.

Review the **attached checklist** for suggestions on some specific security practices to consider.

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### CHECKLIST

Restrict or closely supervise entry by unauthorized persons to your facility or to its critical areas. For example:

- Provide nighttime illumination and video surveillance of facility grounds, exterior and interior

- Use cardlock type systems and warning signs to restrict critical entry areas to authorized persons

- Use metal or metal clad exterior doors

- Provide locks, seals, sensors or alarms for doors, windows, skylights and other access points to facility and to areas where raw materials, in-process, finished products, food contact surfaces and packaging are kept. If removable key operated locks are used, remove any codes that could be used to make new keys, uniquely mark the lock (to allow detection if the same type of lock is substituted), individually number keys and closely control their issuance. Minimize the number of keys that need to be carried off-premises, especially if new keys can be made, and limit key access to authorized employees.

- Minimize or eliminate vehicle access to water sources and other critical areas. Vehicles can carry large amounts of harmful substances.

Improve the security of your vendors and shippers. For example:

- Purchase raw materials and other supplies only from known reputable suppliers and vendors

- Ship finished product only with known reputable shippers

- Use tamper-evident packaging / seals for your products and their shipping containers

- Require the employees of suppliers, vendors and shippers who visit your facility to carry and display photo identification

- Require suppliers, vendors and shippers to provide you with written assurances about their own security practices (e.g., background checks, photo identification, sealed containers with seal numbers on shipping documents, lot code traceability, product return handling procedures, recall procedures)

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Screen all new employee applicants (including seasonal, temporary and contract). For example (applicant approval for screening should be obtained during the hiring process):

- Obtain references from previous employers

- Conduct criminal background checks

- Perform drug testing

Closely supervise new employees. For example:

- Place new employees on shifts where oversight by senior employees is most likely.

Closely supervise all employees. For example:

- Perform random drug testing (check with an attorney to determine how to obtain approval and implement).

- Limit employee access to those areas of your facility necessary for the employee's position. Use daily shift specific rosters

- Prohibit or restrict personal items (e.g., lunch containers, purses) in facility or in critical facility areas

- Provide management owned locks for employee lockers and establish authority to enter lockers randomly for security checks. (Check with an attorney to determine how to obtain approval and implement).

- Install metal mesh lockers that permit employee locker contents to be visible.

- Issue identification badges with photos and ID numbers. Closely control these badges (e.g., keep unissued badges in a secure location, be sure that persons leaving your employment turn in their badges).

Periodically review your practices. For example

- Regularly train employees about your security practices (especially when the practices change) and test their compliance.

- Hire security patrols or services (e.g., monitoring video surveillance equipment)

- Join one or more industry associations where security ideas and concerns can be shared and discussed